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 Corporation, Philips Taiwan Limited, and Philips do  
 Brasil Ltda.*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

) Case No. 07-5944-SC  
 )  
 ) MDL No. 1917  
 )

This Document Relates to:

*Electrograph Sys., Inc. v. Hitachi, Ltd.*,  
 No. 11-cv-01656;

*Electrograph Sys., Inc. v. Technicolor SA*,  
 No. 13-cv-05724;

*Siegel v. Hitachi, Ltd.*,  
 No. 11-cv-05502;

*Siegel v. Technicolor SA*,  
 No. 13-cv-05261;

) **DECLARATION OF TIFFANY B. GELOTT**  
 ) **IN SUPPORT OF DEFENDANTS PHILIPS**  
 ) **ELECTRONICS NORTH AMERICA**  
 ) **CORPORATION'S, PHILIPS TAIWAN**  
 ) **LIMITED'S, AND PHILIPS DO BRASIL**  
 ) **LTDA.'S NOTICE OF MOTION AND**  
 ) **MOTION FOR PARTIAL SUMMARY**  
 ) **JUDGMENT**

) Date: February 6, 2015  
 ) Time: 10:00 a.m.  
 ) Place: Courtroom 1, 17th Floor

) Hon. Samuel P. Conti  
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1 *Best Buy Co., Inc. v. Hitachi, Ltd.,* )  
 No. 11-cv-05513; )  
 2 )  
 3 *Best Buy Co., Inc. v. Technicolor SA,* )  
 No. 13-cv-05264; )  
 4 )  
 5 *Interbond Corp. of Am. v. Hitachi, Ltd.,* )  
 No. 11-cv-06275; )  
 6 )  
 7 *Interbond Corp. of Am. v. Technicolor SA,* )  
 No. 13-cv-05727; )  
 8 )  
 9 *Office Depot, Inc. v. Hitachi, Ltd.,* )  
 No. 11-cv-06276; )  
 10 )  
 11 *Office Depot, Inc. v. Technicolor SA,* )  
 No. 13-cv-05726; )  
 12 )  
 13 *CompuCom Sys., Inc. v. Hitachi, Ltd.,* )  
 No. 11-cv-06396; )  
 14 )  
 15 *P.C. Richard & Son Long Island Corp. v.* )  
*Hitachi, Ltd.,* )  
 16 No. 12-cv-02648; )  
 17 )  
 18 *P.C. Richard & Son Long Island Corp. v.* )  
*Technicolor SA,* )  
 19 No. 13-cv-05725; )  
 20 )  
 21 *Schultze Agency Servs., LLC v. Hitachi, Ltd.,* )  
 No. 12-cv-02649; )  
 22 )  
 23 *Schultze Agency Servs., LLC v. Technicolor SA,* )  
 No. 13-cv-05668; )  
 24 )  
 25 *Tech Data Corp. v. Hitachi, Ltd.,* )  
 No. 13-cv-00157; )  
 26 )  
 27 *Dell Inc. v. Hitachi Ltd.,* )  
 No. 13-cv-02171; )  
 28 )  
 29 *Sears, Roebuck and Co. and Kmart Corp. v.* )  
*Technicolor SA,* )  
 No. 13-cv-05262 )  
 30 )  
 31 *Sears, Roebuck and Co. and Kmart Corp. v.* )  
*Chunghwa Picture Tubes, Ltd.,* )  
 No. 11-cv-05514 )

1 *Sharp Electronics Corp. v. Hitachi Ltd.,* )  
No. 13-cv-1173 SC )  
2 )  
3 *Sharp Electronics Corp. v. Koninklijke Philips* )  
*Elecs., N.V.,* )  
4 No. 13-cv-2776 SC )  
5 )  
5 *ViewSonic Corp. v. Chunghwa Picture Tubes,* )  
*Ltd.,* )  
6 No. 14-cv-2510 SC )  
7 )  
7 *All Indirect Purchaser Actions* )  
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1 I, Tiffany Gelott, declare and state as follows:

2 1. I am an attorney with Baker Botts LLP, attorneys for Philips Electronics North America  
3 Corporation (“PENAC”), Philips Taiwan Limited (“PTL”), and Philips do Brasil Ltda. (“PDBL”) in  
4 the above-captioned action. I am a member of the bar of the District of Columbia and have been  
5 admitted to practice before this Court in this matter *pro hac vice*. I make this declaration in support of  
6 PENAC’s, PTL’s, and PDBL’s Motion for Partial Summary Judgment. The information contained  
7 herein is based on my own personal knowledge, and if called as a witness I could, and would, testify  
8 competently that the matters set forth herein are true.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of relevant portions of the Joint  
10 Venture Agreement by and between LG Electronics Inc. and Koninklijke Philips Electronics N.V.  
11 dated as of June 11, 2001, LGE0000054–161 (“JV Agreement”).

12 3. Attached hereto as Exhibit 2 is a true and correct copy of relevant portions of the  
13 Objections and Responses of Defendant Koninklijke Philips N.V. to Direct Action Plaintiffs’ First Set  
14 of Requests for Admission (July 10, 2014) (“KPNV Responses to DAPs’ First RFAs”).

15 4. Attached hereto as Exhibit 3 is a true and correct copy of relevant portions of the  
16 Declaration of Franciscus Spaargaren (Apr. 10, 2014) (“Spaargaren Decl.”).

17 5. Attached hereto as Exhibit 4 is a true and correct copy of relevant portions of the  
18 Objections and Responses of Defendant Philips Electronics North America Corporation to Indirect  
19 Purchaser Plaintiffs’ First Set of Interrogatories, (September 3, 2014).

20 6. Attached hereto as Exhibit 5 is a true and correct copy of relevant portions of the  
21 Defendant Philips Taiwan Limited to Indirect Purchaser Plaintiffs’ First Set of Interrogatories  
22 (September 3, 2014).

23 7. Attached hereto as Exhibit 6 is a true and correct copy of relevant portions of the  
24 Defendant Philips do Brasil, Ltda. Objections and Responses to Indirect Purchaser Plaintiffs’ First Set  
25 of Interrogatories (September 3, 2014).

26 8. Attached hereto as Exhibit 7 is a true and correct copy of relevant portions of the  
27 Deposition of Roger De Moor (July 31, and August 1, 2012) (“De Moor Dep.”).  
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9. Attached hereto as Exhibit 8 is a true and correct copy of relevant portions of the Deposition of Chih Chun Liu (February 19–21, 2013) (“Liu Dep.”).

10. Attached hereto as Exhibit 9 is a true and correct copy of relevant portions of the Deposition of In Hwan Song (SDI) (Dec. 12–14, 2012) (“Song Dep.”).

11. Attached hereto as Exhibit 10 is a true and correct copy of relevant portions of the Deposition of Kazuhiro Nishimaru (Toshiba) (June 26–28, 2013) (“Nishimaru Dep.”).

12. Attached hereto as Exhibit 11 is a true and correct copy of relevant portions of the Deposition of Yasuki Yamamoto (Toshiba) (July 1–3, 2013) (“Yamamoto Dep.”).

13. Attached hereto as Exhibit 12 is a true and correct copy of relevant portions of the Deposition of Masaki Sanogawaya (MTPD) (July 31–Aug. 2, 2013) (“Sanogawaya Dep.”).

14. Attached hereto as Exhibit 13 is a true and correct copy of relevant portions of the Deposition of Ayuma Kinoshita (MTPD) (Feb. 5–6, 2013) (“Kinoshita Dep.”).

15. Attached hereto as Exhibit 14 is a true and correct copy of relevant portions of the Deposition of Shinichi Iwamoto (MTPD) (Feb. 7–8, 2013) (“Iwamoto Dep.”).

16. Attached hereto as Exhibit 15 is a true and correct copy of relevant portions of the Deposition of Nobuhiko Kobayashi (Hitachi) (May 15–17, 2013) (“Kobayashi Dep.”).

17. Attached hereto as Exhibit 16 is a true and correct copy of PHLP-CRT-048011-012.

18. Attached hereto as Exhibit 17 is a true and correct copy of PHLP-CRT-051463-467.

19. Attached hereto as Exhibit 18 is a true and correct copy of PHLP-CRT-051470.

20. Attached hereto as Exhibit 19 is a true and correct copy of FOX00015812.

21. Attached hereto as Exhibit 20 is a true and correct copy of FOX00385164.

22. Attached hereto as Exhibit 21 is a true and correct copy of HDP-CRT00026035-038.

23. Attached hereto as Exhibit 22 is a true and correct copy of relevant portions of HEDUS-CRT00001609-626.

24. Attached hereto as Exhibit 23 is a true and correct copy of HEDUS-CRT00152790-791.

25. Attached hereto as Exhibit 24 is a true and correct copy of relevant portions of HEDUS-CRT00167890-909.

26. Attached hereto as Exhibit 25 is a true and correct copy of TAEC-CRT-00069443-444.

27. Attached hereto as Exhibit 26 is a true and correct copy of TAEC-CRT-00073598-601.

28. Attached hereto as Exhibit 27 is a true and correct copy of relevant portions of LG.Philips Displays Holding B.V. US \$2,000,000,000 Senior Term Loan and Revolving Credit Facility Confidential Information Memorandum (May 2001) (“Information Memorandum”), T00019542-646.

29. Attached hereto as Exhibit 28 is a true and correct copy of relevant portions of the Deposition of Patrick Canavan (January 30–31, 2014) (“Canavan Dep.”).

30. Attached hereto as Exhibit 29 is a true and correct copy of relevant portions of the Deposition of Jan de Lombaerde (Oct. 9, 2014) (“Lombaerde Oct. 9 Dep.”).

31. Attached hereto as Exhibit 30 is a true and correct copy PHLP-CRT-033780-781.

32. Attached hereto as Exhibit 31 is a true and correct copy of JLJ-00001890-892.

33. Attached hereto as Exhibit 32 is a true and correct copy of PHLP-CRT-012618-619.

34. Attached hereto as Exhibit 33 is a true and correct copy of PHLP-CRT-026877-879.

35. Attached hereto as Exhibit 34 is a true and correct copy of relevant portions of the Deposition of Wiebo Vaartjes (Dec. 18–19, 2013) (“Vaartjes Dep.”).

36. Attached hereto as Exhibit 35 is a true and correct copy of relevant portions of the Objections and Responses by Plaintiffs Dell Inc. and Dell Products L.P. to Defendant KPNV’s First Set of Interrogatories, Supplemental Attachment A (September 11, 2014).

37. Attached hereto as Exhibit 36 is a true and correct copy of relevant portions of the Deposition of Kris Mortier (June 9-10, 2014).

38. Attached hereto as Exhibit 37 is a true and correct copy of relevant portions of PHLP-CRT-032285 (Q&A “From the Management Kickoff,” July 4, 2001).

39. Attached hereto as Exhibit 38 is a true and correct copy of relevant portions of the Deposition of Jan de Lombaerde (Oct. 10, 2014) (“Lombaerde Oct. 10 Dep.”).

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge and information.

3 Executed on November 7, 2014 in Washington, D.C.  
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5 /s/ Tiffany B. Gelott

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